

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
JASON RYAN MARTIN, AKA	:	
JASON R. MARTIN and	:	
AMANDA GAYLE MARTIN, AKA	:	
AMANDA G. MARTIN, AKA	:	
MANDI MARTIN,	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
JASON RYAN MARTIN, AKA	:	
JASON R. MARTIN and	:	
AMANDA GAYLE MARTIN, AKA	:	
AMANDA G. MARTIN, AKA	:	
MANDI MARTIN,	:	
Respondents	:	CASE NO. 1-25-bk-00010-HWV

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 19th day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors’ Plan for the following reasons:

1. Trustee avers that Debtors’ Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid. The Plan will likely be underfunded when all tax claims are filed and attorney’s fees are considered.
 - b. The Plan proposes an unrealistic and speculative step payment, contrary to § 1325(a)(6).
 - c. The Plan is inconsistent with Proofs of Claim filed and/or approved by the Court. No Proofs of Claim have been filed for the PA Department of Revenue or the YATCB.
2. Debtors have not demonstrated that all tax returns have been filed as required by §1325(a)(9). More specifically, the Debtors’ 2021, 2022, 2023, and 2024 federal taxes are not filed.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 19th day of May 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire
CGA Law Firm, P.C.
135 North George Street
York, PA 17401

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee